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[Additional Counsel Appear On Signature Page]

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

ROBERT and DANIELLE BLANGERES,  
individually and on behalf of all others  
similarly situated,

## Plaintiffs,

No. 2:13-cv-00260-LRS

**MOTION FOR ADMISSION  
*PRO HAC VICE***

UNITED STATES SEAMLESS, INC.,  
and KAYCAN LIMITED.

### Defendants.

Michael J. Flannery (the “Applicant”) hereby moves the Court to enter an order permitting him to participate in this case *pro hac vice* as counsel for Plaintiffs Robert and Danelle Blangeres (“Plaintiffs”), pursuant to Local Rule 83.2(c). In support of this motion, the Applicant states as follows:

1. The Applicant is a partner in the law firm of Cuneo Gilbert & LaDuka, LLP, in St. Louis, Missouri.

2. The Applicant is a member in good standing of the bars of several United States federal courts, the highest state court of Missouri, California, and Virginia, and the District of Columbia.

1       3. The Applicant does not reside in the State of Washington and does not  
 2 maintain an office in the State of Washington.

3       4. The Applicant responds to the information requested in Local Rules  
 4 83.2(c)(2) as follows:

- 5           a. The Applicant's address and telephone number are 7733 Forsyth Blvd.,  
 6 Suite 1675, Clayton, MO 63105; telephone number (202) 789-3960;  
 7 facsimile (202) 789-1813; email: mflannery@cuneolaw.com
- 8           b. The dates of admission to practice before other courts are listed below:

<b>State Bar Admission</b>	<b>Date Admitted</b>
Virginia	9/30/1991
District of Columbia	3/25/1992
California	7/20/1998
Missouri	4/6/2001

15       c. The name, address, and telephone number of admitted counsel with  
 16 whom the Applicant will be associated are: Beth E. Terrell and Erika L.  
 17 Nusser of Terrell Marshall Daudt & Willie PLLC, 936 North 34th Street,  
 18 Suite 300, Seattle, Washington, 98103-8869; telephone (206) 816-6603;

19           facsimile (206) 350-3528; email: bterrell@tmdwlaw.com,  
 20 enusser@tmdwlaw.com.

21       d. The Applicant's appearance is necessary because Plaintiffs in this action  
 22 have retained him in this action.

23       e. There are no disciplinary sanction actions pending against the Applicant  
 24 and the Applicant has never been subject to any disciplinary sanctions by  
 25 any court or Bar Association.

26       5. The Applicant understands that if she is admitted *pro hac vice* she will be  
 27 subject to the disciplinary jurisdiction of this Court.

1       6. The Applicant is familiar with the facts, issues, and documents  
2 associated with this case.

3       7. The Applicant is familiar with the local rules of this Court.

4 WHEREFORE, Michael J. Flannery respectfully requests that the Court enter  
5 an order in the form proposed granting the admission *pro hac vice* of Michael J.  
6 Flannery during the pendency of this case.

7 I declare under penalty of perjury under the laws of the United States of  
8 America that the foregoing is true and correct.

9  
10 Dated: April 30, 2015

/s/ Michael J. Flannery

11 Michael J. Flannery, Applicant

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## **STATEMENT OF LOCAL COUNSEL**

I, Beth E. Terrell, state that Jennifer Rust Murray, Erika L. Nusser, and I are co-counsel for Plaintiffs in this matter. We will participate in a meaningful manner in preparation and trial of this case and we are authorized and will be prepared to handle this matter, including trial, in the event that the applicant Michael J. Flannery is unable to be present upon any date assigned by the Court.

RESPECTFULLY SUBMITTED AND DATED this 30th day of April, 2015.

# TERRELL MARSHALL DAUDT & WILLIE PLLC

By: /s/ Beth E. Terrell, WSBA #26759  
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## CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on April 30, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED this 30th day of April, 2015.

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